

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE  
JOSE ALBERTO RIVERA CONTRERAS  
JARITZA VEGA VERGARA  
HC 02 Box 13875  
Aguas Buenas PR 00703  
SSN: xxx-xx-6892/xxx-xx-2269  
Debtors

CASE NO. 08-03045 GAC

CHAPTER 7

**DEBTOR'S MOTION TO REDEEM  
M BERRIOS COLLATERAL**

TO THE HONORABLE COURT:

**COMES NOW** debtor through his legal representation who prays:

1. Debtor filed a petition for relief on May 13, 2008.
2. At the time of filing, debtor claimed as exempt personal property in that of: Bedroom set, in which collateral Mueblería Berrios [hereinafter Berrios] is a secured creditor.
3. At the time of filing, debtor owed Berrios approximately \$1,228.00.
4. Debtors use their household furnishings primarily for personal, family and household use, and these were claimed as exempt property pursuant to 11 USC §522(d)(1).
5. The household furnishings are fully exempt.
6. At the time of filing, the furniture had depreciated through use and wear, soiled or stained by their children and pets, and/or the vinyl stripping damaged due to poor quality of the furniture. It is believed that the fair market value of the furniture at the time of filing is approximately \$400.00
7. Debtor has exempt funds with which they are in a position to redeem their furnishings for cash, from Berrios, pursuant to 11 USC §722.

WHEREFORE, debtor respectfully requests that they be allowed to redeem their household furnishings described here from Berrios, by paying Berrios the sum of \$400.00 within thirty (30) days of the entry of such an Order, or within 30 days of the entry of discharge, whichever occurs later, and that Berrios release its secured interest and/or lien to debtor within ten (10) days of receipt of said funds and a conformed copy of the Order herein.

**NOTICE TO BERRIOS**

Debtors have filed *Motion to Redeem BERRIOS Collateral*. Should you fail to file a written and timely opposition within 30 days from the date of this notice, the redemption requested herein may be granted by the Court without further notice or hearing. Should you oppose you must file a written opposition and request a hearing within 20 days from receipt of this motion.

*CERTIFICATE OF ELECTRONIC FILING & NOTICE*

This motion has been filed electronically and caused to be noticed to Berrios CM/ECF noticing system and to the Chapter 7 Trustee, John A Zerbe through the same means. A copy of this motion has also been noticed through Certified Mail to BERRIOS.

DATE: Jun 19, 2008

*LA Morales Vidal*  
/s/LYSSETTE MORALES VIDAL  
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